

ORIGINAL



0000118253

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

Arizona Corporation Commission

DOCKETED

SEP 21 2010

COMMISSIONERS

KRISTIN K. MAYES - Chairman

GARY PIERCE

PAUL NEWMAN

SANDRA D. KENNEDY

BOB STUMP

2010 SEP 21 P 2:34

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

DOCKETED BY

IN THE MATTER OF THE JOINT
APPLICATION OF QWEST CORPORATION,
QWEST COMMUNICATIONS COMPANY,
LLC, QWEST LD CORP., EMBARQ
COMMUNICATIONS D/B/A CENTURYLINK
COMMUNICATIONS, EMBARQ PAYPHONE
SERVICES, INC. D/B/A CENTURYLINK,
AND CENTURYTEL SOLUTIONS, LLC FOR
APPROVAL OF THE PROPOSED MERGER
OF THEIR PARENT CORPORATIONS
QWEST COMMUNICATIONS
INTERNATIONAL INC. AND CENTURYTEL,
INC.

DOCKET NO. T-01051B-10-0194
T-02811B-10-0194
T-04190A-10-0194
T-20443A-10-0194
T-03555A-10-0194
T-03902A-10-0194

**COMMISSION STAFF'S REQUEST FOR
AN EXTENSION OF TIME TO FILE
INITIAL TESTIMONY**

On May 13, 2010, Qwest Corporation, Qwest Communications Company, LLC, Qwest LD Corp., (hereinafter referred to as "Qwest") Embarq Communications, Inc. d/b/a CenturyLink Communications, Embarq Payphone Services, Inc. d/b/a CenturyLink and CenturyTel Solutions, LLC, (hereinafter referred to as "CenturyLink")(together, the "Joint Applicants"), filed with the Arizona Corporation Commission ("Commission") a joint application for approval of the proposed merger of the Applicants' respective parent corporations, Qwest Communications International Inc., and CenturyTel, Inc. On May 24, 2010, the Joint Applicants filed Direct Testimony in support of their Application.

By Procedural Order dated July 2, 2010, the deadline for Staff and Intervenor's testimony on Qwest's and CenturyLink's Application was set at September 27, 2010. While Staff has been diligently working on this matter since the Application was filed, Staff requests an extension of time of two weeks until October 12, 2010 to file its initial testimony. Due to the nature of the issues raised in this case, Staff would like an opportunity to review all parties' initial testimony before it files its initial testimony in this case. This same approach has been utilized in other telecommunications dockets. Staff also seeks the additional time because it will allow Staff to continue to monitor the

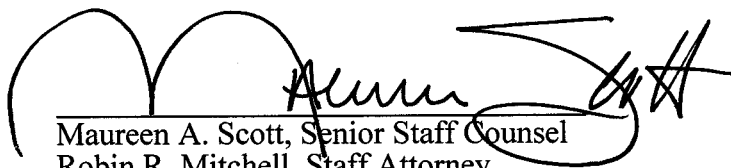
1 positions of other State commission staffs in the Qwest 14 state region and take those into account
2 when it files its testimony in early October.

3 Staff does not believe that its request for extension should necessitate any change in the
4 remainder of the schedule. Assuming that other Intervenor adheres to the September 27, 2010
5 deadline, and Staff files on October 12, 2010; this still would give Qwest and CenturyLink a month to
6 respond to all Intervenor testimony and two weeks to respond to Staff's testimony since the Joint
7 Applicants' rebuttal testimony is due on or before October 27, 2010.

8 WHEREFORE, the Commission Staff respectfully requests an extension of time until October
9 12, 2010 to file its initial testimony in this case for the reasons discussed above

10 RESPECTFULLY SUBMITTED this 21st day of September, 2010.

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


Maureen A. Scott, Senior Staff Counsel
Robin R. Mitchell, Staff Attorney
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007
(602) 542-3402

Original and thirteen (13) copies
of the foregoing filed this
21st day of September 2010 with:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

...

...

...

1 Copies of the foregoing mailed this
2 21st day of September 2010 to:

3 Jeffrey W. Crockett
4 Bradley S. Carroll
5 Snell & Wilmer LLP
6 One Arizona Center
7 400 East Van Buren Street
8 Phoenix, Arizona 85004-2202
9 Attorney for CenturyLink

10 Kevin K. Zarling
11 Senior Counsel, CenturyLink
12 400 West 15th Street, Suite 315
13 Austin, Texas 78701
14 Attorney for CenturyLink

15 Norman G. Curtright
16 David Ziegler
17 Qwest Corporation
18 20 East Thomas Road, 16th Floor
19 Phoenix, Arizona 85012
20 Attorneys for Qwest

21 Michael W. Patten
22 Timothy J. Sabo
23 Roshka, DeWulf & Patten, PLC
24 One Arizona Center
25 400 East Van Buren, Suite 800
26 Phoenix, Arizona 85004
27 Attorneys for Cox Arizona Telcom, LLC,
28 Level 3 Communications, LLC, Paetec
Business Services, Integra Telecom and
Covad Communications Company

Karen L. Clauson
Vice President, Law & Policy
Integra Telecom
6160 Golden Hills Drive
Golden Valley, Minnesota 55416-1020

Gregory Merz
Gray Plant Mooty
500 IDS Center
80 South Eighth Street
Minneapolis, Minnesota 55402

Gregory L. Rogers
Level 3 Communications, LLC
1025 Eldorado Boulevard
Broomfield, Colorado 80021

Scott J. Rubin, Esq.
333 Oak Lane
Bloomsburg, Pennsylvania 17815

Rogelio Pena
Pena & Associates, LLC
4845 Pearl East Circle, Suite 101
Boulder, Colorado 80301

Daniel W. Pozefsky, Chief Counsel
Residential Utility Consumer Office
1110 West Washington, Suite 220
Phoenix, Arizona 85007

Stephen S. Melnikoff
General Attorney
Regulatory Law Office (JALS-RL)
U.S. Army Litigation Center
901 North Stuart Street, Suite 700
Arlington, Virginia 22203-1837

Nicholas J. Enoch
Jarrett J. Haskovec
Lubin & Enoch, PC
349 North Fourth Avenue
Phoenix, Arizona 85003
Attorneys for Communications Workers of
America and AFL-CIO, CLC

Michel Singer Nelson
360networks (USA) inc.
370 Interlocken Blvd., Ste. 600
Broomfield, Colorado 80021

Penny Stanley
360networks (USA) inc.
370 Interlocken Blvd., Suite 600
Broomfield, Colorado 80021

William A. Haas
Vice President of Public Policy & Regulatory
Paetec Holding Corp.
One Martha's Way
Hiawatha, Iowa 52233

James C. Falvey
Senior Regulatory Counsel
Pac-West Telecomm, Inc.
420 Chinquapin Round Road, Suite 2-I
Annapolis, Maryland 21401

1 Harry Gildea
2 Snavely King Majoros, et al.
3 1111 14th Street, N.W., Suite 300
4 Washington, D.C. 20005

5 Mark A. DiNunzio
6 Cox Arizona Telecom, LLC
7 1550 West Deer Valley Road
8 MV DV3-16, Building C
9 Phoenix, Arizona 85027

10 Katherine K. Mudge, Director
11 State Affairs & ILEC Relations
12 Covad Communications Company
13 7000 North Mopac Expressway
14 Second Floor
15 Austin, Texas 78731

16 Joan S. Burke, Esq.
17 Law Office of Joan S. Burke
18 1650 North First Avenue
19 Phoenix, Arizona 85003

20 Lyndall Nipps
21 tw telecom
22 9665 Granite Ridge Drive, Suite 500
23 San Diego, California 92123

24
25
26
27
28
